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Filing date: **02/01/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91207718
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Correspondence Address	Mary L. Kevlin Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES sis@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Signature	/Seth Shaifer/
Date	02/01/2013
Attachments	WARRIOR ATHLETICS Motion on Consent to Suspend 020113.pdf ( 3 pages ) (19970 bytes )

In re Application Serial No. 85/474,290  
Filed: November 16, 2011  
For Mark: WARRIOR ATHLETICS  
Published in the Official Gazette: May 1, 2012

# Opposition No. 91207718

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of one (1) month, until **March 1, 2013**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made in this matter. Since the last suspension, Opposer's outside counsel has drafted a settlement agreement and sent it to Opposer's in-house counsel for review. The additional time is requested to allow Opposer's in-house counsel to complete their review, Opposer's outside counsel to forward the revised agreement to Applicant, and for the parties to

continue to pursue settlement. If accepted, the settlement agreement would resolve this matter without the need to proceed with the opposition proceedings.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York  
February 1, 2013

COWAN LIEBOWITZ & LATMAN, P.C.  
Attorneys for Opposer

By: /Seth Shaifer/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on February 1, 2013, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Anthony P. Luisi, Esq., Cuddy & Feder LLP, 445 Hamilton Avenue, 14<sup>th</sup> Floor, White Plains, New York 10601-1874.

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/Seth Shaifer/  
Seth Shaifer